

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

MICHAEL GOZA,

Plaintiff,

v.

Case No. 17-cv-2873

MEMPHIS LIGHT, GAS AND WATER DIVISION,  
a division of the City of Memphis, Tennessee,

Defendant.

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**DEFENDANT’S RULE 26(a)(3) PRETRIAL DISCLOSURES**

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COMES NOW Defendant Memphis Light, Gas and Water, by and through undersigned counsel, and pursuant to Rule 26(a)(3), Fed. R. Civ. P., hereby submits its pretrial disclosures.

**I. Plaintiff anticipates calling the following witnesses at trial:**

**Will Call:**

1. Virginia Leonard;
2. Stacey Greenberg.

**May Call:**

3. Angela Hewlett;
4. Jerry Collins;
5. Von Goodloe;
6. Gale Jones Carson;
7. Christopher Bieber;
8. Richard Thompson;
9. Bill Hawkins  
Vice-President IBEW Local 1288  
(901) 870-3339;
10. Clint Richardson;

11. Michael Page;
12. Don Moore;
13. Michael Hill  
146 Bridgewood Drive  
Killen, AL 35645;
14. Keedran Franklin;
15. Sarah Orndorff;
16. Jose Salazar;
17. Any witness identified by the Plaintiff;
18. Any other individual necessary to authenticate documents or records;
19. Any witnesses listed by the parties or identified by parties in disclosures, discovery responses or pretrial order;
20. Defendant reserves the right to call additional witnesses for the purposes of impeachment and rebuttal.

**II. Defendant may offer the deposition testimony of the following persons either in lieu of calling the individuals live at trial or if the witnesses do not appear in person:**

Bill Hawkins 65:15-66:13, 73:19-76:4, 85:20-22

**III. Defendant will introduce the following exhibits at trial:**

1. Investigative File MLGW 00001-00018
2. Customer Service Technician III Job Description MLGW 00181
3. Vacancy Details Considered in Goza's Transfer MLGW 00892-00960
4. MLGW Anti-Harassment Policy MLGW 00409-412
5. MLGW Standards of Business Conduct MLGW 00413-00418
6. MLGW Labor Relations Bulletin #87 MLGW 00419
7. MLGW Labor Relations Bulletin #104 MLGW 00420
8. Customer Service Field Operations Handbook MLGW 00421-00513

9. Termination Letter MLGW 00514
10. E-mail Bill Hawkins to Virginia Leonard September 22, 2017 MLGW 00515
11. Orndorff Complaint- MLGW 00607-00614
12. Facebook Posts by Keedran Franklin MLGW001660-001661
13. Material Handler Job Description MLGW 00631
14. Charter of the City of Memphis § 699

**IV. Defendant may introduce the following exhibits at trial:**

1. Memorandum of Understanding (2014-2018) MLGW 00536-00605
2. Interdepartmental Memorandum by Michael Page MLGW 00516
3. E-mail chain with Communications Department MLGW 01764-1770, 1835
4. E-mail chain Communications Department regarding first complaint on Goza MLGW 001973-001976
5. Facebook complaints against Goza received by Communications Department MLGW 002094-002098
6. “Corrections Officer relieved of duty over Social Media Posts,” News story, August 24, 2017, MLGW 001817-001818
7. E-mail from Virginia Leonard- MLGW 001660
8. E-mail from Virginia Leonard MLGW 001985
9. E-mail chain regarding complaints against Goza from August 28, 2018 MLGW 001834-1835
10. Leonard E-mail regarding customer service departmental procedures MLGW 1843
11. Work Rules for Customer Service II and III MLGW 001858-001865
12. Excerpt from MLGW agreement with Tennessee Valley Authority MLGW 002020
13. Leonard E-mail chain with Bieber with names of complainants MLGW 002014-002016
14. E-mail chain regarding possible public statement August 28, 2017 MLGW 001853-001854

15. Chris Bieber's file on Goza MLGW 002067-002080
16. Goza's E-mail Communication with the League of the South LOS 0001-00027
17. Maps of Work Areas MLGW 002104-002119
18. Goza Grievances MLGW 002055-2056
19. E-mail between Michael Goza and Michael Hill- Plaintiff's Supplemental Disclosures 00033-34
20. Plaintiff's Answers to Defendant's First Set of Interrogatories
21. Plaintiff's Responses to Defendant's First Requests for Admission
22. Any and all documents identified by Plaintiff

Respectfully submitted,

**FISHER & PHILLIPS LLP**

By: /s/Robert W. Ratton, III  
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*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 5, 2018, I electronically filed the foregoing with the Clerk of Court using the ECF system, which sent notice of this filing to all parties of record.

/s/Robert W. Ratton, III